

REMARKS

Claims 4-10, 12-17, 20-22, 25-34, and 37-45 are currently pending in the application. Claims 43, 44, and 45 have been amended in response to the Examiner's rejection under 37 U.S.C. § 112, second paragraph. Claim 43 has been amended as follows:

- At line 8, by adding the phrase “connected to an interactive communications medium”;
- At line 11, by moving the phrase “presenting a dynamic set of questions” to line 13;
- At lines 17-20, by changing “using a computer to analyze a user's answers to said dynamic set of questions and to determine general or specific business solutions based on an analysis of said user's answers, and providing said general or specific business solutions to said user, and” to “using a computer to analyze said user's answers to said dynamic set of questions and to determine a business solution based on an analysis of said user's answers, and for providing said business solution to said user”;
- At lines 21-24, by changing “using a computer to analyze a specific business solution and to perform a financial analysis based on a selected industry, business measures and associated benchmarks, wherein said financial analysis is a return on investment analysis” to “using a computer to analyze said solution based on a selected industry, business measures and associated benchmarks, and to perform a return on investment analysis”; and
- At line 25, by changing “associated with the” to “identifying said”.

Claim 44 has been amended as follows:

- At line 10, by adding the phrase “connected to an interactive communications medium”;

- At line 13, by moving the phrase “presenting a dynamic set of questions” to lines 15-16;
- At lines 20-23, by changing “means for using a computer to analyze a user’s answers to said dynamic set of questions and to determine general or specific business solutions based on an analysis of said user’s answers, and providing said general or specific business solutions to said user, and” to “means for using a computer to analyze said user’s answers to said dynamic set of questions and to determine a business solution based on an analysis of said user’s answers, and for providing said business solution to said user”;
- At lines 24-27, by changing “means for using a computer to analyze a specific business solution and to perform a financial analysis based on a selected industry, business measures and associated benchmarks, wherein said financial analysis is a return on investment analysis” to “means for using a computer to analyze said business solution based on a selected industry, business measures and associated benchmarks, and to perform a return on investment analysis” at lines 24-27; and
- At lines 28-29, by changing “associated with the” to “identifying said”.

Claim 45 has been amended as follows:

- At lines 10-11 by adding the phrase “connected to an interactive communications medium” and deleting the phrase “to permit”;
- At line 14, by moving the phrase “presenting a dynamic set of questions” to lines 16-17;
- At lines 21-24, by changing “instructing a computer to analyze a user’s answers to said dynamic set of questions and to determine general or specific business solutions based on an analysis of said user’s answers, and providing said general or specific business solutions to said user, and” to “instructing a computer to analyze said user’s answers to said dynamic set of questions and to determine a business solution based on an analysis of

- said user's answers, and for providing said business solution to said user";
- At lines 25-28, by changing "instructing a computer to analyze a specific business solution and to perform a financial analysis based on a selected industry, business measures and associated benchmarks, wherein said financial analysis is a return on investment analysis" to "instructing a computer to analyze said business solution based on a selected industry, business measures and associated benchmarks, and to perform a return on investment analysis"; and
 - At lines 29-30, by changing "associated with the" to "identifying said".

THE CLAIMED INVENTION

The claimed invention describes an apparatus and method of providing business solutions and services via an interactive communications medium, where such solutions and services are currently devised using consultants, accountants, and sales people. The claimed invention provides a method of providing business solutions over an interactive communications medium, which may be the world wide web portion of the Internet. (Figure 4) The method includes selectively providing metrics which are associated with a business problem and a specific industry and providing a business solution based on the selective metrics and responses to the selective metrics, which take the form of a dynamic set of questions. (Figure 1; Specification at 7, line 11) The metrics module 104 may include questions requiring a "yes or no" response or a response within a certain range, enabling the use of industry benchmarks to determine whether a given range is acceptable or problematic. Alternatively, the metrics module 104 may solicit a more quantitative response. The dynamic set of questions is preferably provided in a hierarchical tree format. (Figure 3) In addition, the claimed invention provides a method for providing business solutions over an interactive communications medium. The method includes identifying a specific industry and providing at least one business measure associated with a particular financial aspect of the specific industry. (Figure 2) The method further includes providing a set of questions associated with problems of the specific industry,

where the set of questions are related to each of the provided at least one business measure. Thus, the user response to the question presented by the metrics module 104 is used either to generate new pertinent questions or to map generic solutions in a solution area (see table of "solution areas" discussed below). A business solution is thus provided based on responses to the set of questions and the specific industry. Furthermore, the claimed invention provides a system for providing business solutions over an interactive communications medium. The system further includes a business solution module which provides business solutions based on responses to the selected questions stored in the business metrics module and the specific industry. Finally, the claimed invention provides a machine readable medium containing instructions for a computer to provide business solutions over an interactive communications medium. The instructions implement the steps of selectively providing metrics which are associated with a business problem and a specific industry and providing a business solution based on the selective metrics and responses to the selective metrics.

The example requested by the Examiner (Office Action at 2-4) is provided as follows:

1. Customer Information

Name: Tom Doe
e-Mail: tom@xyz.com
Job Title: CEO
Company: XYZ Manufacturing Co.
Co. Address: 100 Main St., Anywhere, NY
Telephone: (914) 555-1212
Fax: (914) 555-1212
Industry: ☒ Industrial ☐ Retail ☐ Wholesale
Subindustry or SIC: Electronic components and access (367X)
Primary Channel: ☒ Brick & Mortar ☐ Catalog ☐ Internet
☐ Direct Marketing ☐ Mail Order

Secondary Channel: ☐ Brick & Mortar ☒ Catalog ☐ Internet
☐ Direct Marketing ☐ Mail Order ☐ None

Number of Employees: ☐ 1-50 ☐ 51-100 ☐ 101-500 ☐ 501-1,000
☒ Over 1,000

Annual Revenue (\$M): ☐ 0-10 ☐ 11-25 ☐ 26-50 ☐ 51-100
☐ 101-250 ☒ 251-500 ☐ 501-1,000 ☐ Over 1,000

2. Financial Drivers

INV-1 Inventory Turns

Are your inventory turns competitive in your subindustry?

- ☐ Yes (If this is checked, skip page 14)
☒ No (If this is checked, go to page 14 soon after completing this page)
☐ Not interested (If this is checked, skip page 14)

REV-1 Revenue Growth

Is your revenue growth competitive in your subindustry?

- ☒ Yes (If this is checked, skip page 14)
☐ No (If this is checked, go to page 14 soon after completing this page)
☐ Not interested (If this is checked, skip page 14)

SGA-1 Sales, General, and Administrative Costs

Are your Sales, General, and Administrative (SG&A) costs competitive in your subindustry?

- ☒ Yes (If this is checked, skip page 14)
☐ No (If this is checked, go to page 14 soon after completing this page)
☐ Not interested (If this is checked, skip page 14)

AT-1 Asset Turnover

Is your asset turnover competitive in your subindustry?

☒ Yes (If this is checked, skip page 14)

☐ No (If this is checked, go to page 14 soon after completing this page)

☐ Not interested (If this is checked, skip page 14)

COGS-1 Cost of Goods Sold

Is your Cost of Goods Sold (COGS) competitive in your subindustry?

☒ Yes (If this is checked, skip page 14)

☐ No (If this is checked, go to page 14 soon after completing this page)

☐ Not interested (If this is checked, skip page 14)

AR-1 Accounts Receivable

How would you characterize the length of time it takes you to collect payments from your customers?

☐ Longer than typical competitor (If this is checked, go to page 14 soon after completing this page)

☒ Equal to typical competitor (If this is checked, skip page 14)

☐ Shorter than typical competitor (If this is checked, skip page 14)

☐ Not interested (If this is checked, skip page 14)

AP-1 Accounts Payable

How would you characterize the length of time it takes you to pay your suppliers?

☐ Longer than typical competitor (If this is checked, skip page 14)

☒ Equal to typical competitor (If this is checked, skip page 14)

☐ Shorter than typical competitor (If this is checked, skip page 14 soon after completing this page)

☐ Not interested (If this is checked, skip page 14)

3. Inventory Turns

INV-2 Inventory Areas [ANSWER IF INV-1 = No]

Which inventory areas are of concern to you? (Check all that apply)

☐ Raw materials☒ Work in process☒ Finished goods

INV-3 Forecasting Accuracy [ANSWER IF INV-2 = Raw materials OR Finished goods]

Would you say that your demand forecasting accuracy is adequate for your environment?

☐ Yes☒ No

INV-4 Forecasting Tools [ANSWER IF INV-3 = No]

What tools do you use for forecasting? (Check all that apply)

☒ Spreadsheets☐ Off-the-shelf tools☐ Internal tools☐ Manual process

INV-5 Inventory Count [ANSWER IF INV-3 = No]

Do you maintain an accurate inventory count for each product and raw material?

☒ Yes☐ No

INV-6 Raw Material Inventory Policy [ANSWER IF
INV-2 = Raw materials]

What policies do you use to drive your raw material inventory
levels? (Check all that apply)

- ☐ Vendor managed inventory
- ☐ Just in time
- ☐ Build to order
- ☐ Continuous replenishment
- ☐ Constrained MRP
- ☐ Unconstrained MRP
- ☐ Other

INV-7 Replenishment Frequency [ANSWER IF INV-2 = Raw
materials]

How often do you place orders to your suppliers?

- ☐ Daily
- ☐ Weekly
- ☐ Bi-weekly
- ☐ Monthly

INV-8 Supplier Performance [ANSWER IF INV-2 = Raw
materials]

How would you rate your supplier performance?

- ☐ Excellent
- ☐ Room for improvement

INV-9 Replenishment Lead Time [ANSWER IF
INV-8 = Room for improvement]

What is the typical lead time for raw materials?

- ☐ < 1 day
- ☐ 1-2 days
- ☐ 3-14 days
- ☐ 15-30 days
- ☐ > 30 days
- ☐ We have no raw materials

INV-10 On-Time Replenishment [ANSWER IF
INV-8 = Room for improvement]

Do supplier shipments arrive on time?

- ☐ Always
- ☐ Usually
- ☐ Less than 50% of the time
- ☐ Less than 20% of the time

INV-11 Supplier Flexibility [ANSWER IF INV-8 = Room
for improvement]

How flexible are your suppliers? (Check all that apply)

- ☐ They are willing to handle emergency shipments
- ☐ They accept late cancellations
- ☐ They will store products for you in their warehouses
- ☐ They can handle smaller more frequent orders
- ☐ They notify you of problems that will impact delivery
- ☐ They provide real time order status tracking

INV-12 Supplier Communication [ANSWER IF
INV-8 = Room for improvement]

Is the majority of your communication with your suppliers
via EDI, the Internet, or through an e-procurement
solution?

☐ Yes

☐ No

INV-13 Raw Material Lot Sizes [ANSWER IF INV-2 = Raw
materials]

Do you think that large lot sizes contribute to your overage of raw
materials?

☐ Yes

☐ No

INV-14 Material Handling [ANSWER IF INV-2 = Work in
process OR Finished goods]

Is a lot of your manufacturing lead time due to material handling?

☐ Yes

☒ No

INV-15 Line Balance [ANSWER IF INV-2 = Work in process
OR Finished goods]

Do you have serious bottlenecks on your manufacturing line?

☐ Yes

☒ No

INV-16 Machine Availability [ANSWER IF INV-2 = Work in process OR Finished goods]

Do machine failures often cause unexpected manufacturing delays?

☐ Yes

☒ No

INV-17 Scheduling Tools [ANSWER IF INV-2 = Work in process OR Finished goods]

What tools do you use to sequence and schedule your manufacturing line? (Check all that apply)

☐ Spreadsheets

☒ Off-the-shelf tools

☐ Internal tools

☐ Manual process

INV-18 Scheduling Frequency [ANSWER IF INV-2 = Work in process OR Finished goods]

How often do you schedule your manufacturing line?

☒ Daily

☐ Weekly

☐ Bi-weekly

☐ Monthly

INV-19 Buffer Sizes [ANSWER IF INV-2 = Work in process OR Finished goods]

How do you determine your maximum buffer sizes? (Check all that apply)

☐ Off-the-shelf tools

☐ Internal tools

☒ Manual process

INV-20 Manufacturing Quality [ANSWER IF INV-2 = Work in process OR Finished goods]

Is your manufacturing quality acceptable?

☒ Yes

☐ No

INV-21 Finished Goods Inventory Policy [ANSWER IF INV-2 = Finished goods]

What policies do you use to drive your finished goods inventory levels? (Check all that apply)

☐ Build to order

☐ Postponement

☐ Continuous replenishment

☐ Constrained MRP

☐ Unconstrained MRP

☒ Build to plan

☐ Other

INV-22 Finished Goods Lot Sizes [ANSWER IF

INV-2 = Finished goods]

Do you think that large manufacturing lot sizes contribute to your overage of finished goods?

☐ Yes

☒ No

INV-23 e-Marketplace Selling [ANSWER IF INV-2 = Finished goods]

Are you currently using an e-marketplace to sell off excess inventory?

☒ Yes

☐ No

INV-24 Unsellable Inventory [ANSWER IF INV-2 = Finished goods]

What percentage of your inventory do you consider unsellable (obsolete or about to perish)

☒ 0-2%

☐ 3-6%

☐ 7-12%

☐ > 12%

4. Results and Analysis of the Interview

In the foregoing example, the customer indicates that his firm has an inventory problem but apparently no other financial problems. Therefore the remainder of this example requires only the inventory section. Because of the dynamic nature of the computerized interview, any given customer will typically be presented with only some of the

questions shown above; questions without checked answers would not be shown.

There are many potential root causes for inventory problems at an industrial firm. Overall, this set of questions includes 20 possible root causes that could be presented to a customer. Based on this customer's answers, above, the claimed invention concludes that the following 3 potential problems exist in the customer's firm:

- Forecasting tools: The demand forecasting is inaccurate and low-technology spreadsheets are being used for forecasting (Question INV-4).
- The firm is using a finished goods inventory policy called "Build to plan" (Question INV-21). The "Build to plan" policy causes finished goods to be manufactured based on a forecast, and we know from above that the forecast is inaccurate.
- Buffer sizes are being determined by a manual process (Question INV-19).

To reduce the finished goods inventory, a competent supply chain consultant might suggest that the customer use an off-the-shelf tool for demand forecasting and that finished goods inventory targets be based on a more sensible policy such as "Build to order", "Postponement" or "Continuous replenishment". To reduce the work in process, a consultant might suggest that the customer use an off-the-shelf tool to determine buffer sizes. However, there is no supply chain consultant present during this interview. The claimed invention automatically suggests that the customer look into the following solution areas:

Solution areas

Here is a list of potential problems within your company and the solution areas that may provide improvement.

Solution areas-problems	
#	Problem
1 <input type="checkbox"/> Advanced planning	1. Buffer sizes 2. Finished goods inventory policy 3. Forecasting tools
2 <input type="checkbox"/> Enterprise relationship management (ERM)	1. Buffer sizes 2. Finished goods inventory policy 3. Forecasting tools
3 <input type="checkbox"/> Manufacturing	1. Buffer sizes 2. Finished goods inventory policy
4 <input type="checkbox"/> Business intelligence (BI)	1. Forecasting tools
5 <input type="checkbox"/> Collaboration	1. Forecasting tools
6 <input type="checkbox"/> Network management	1. Forecasting tools
7 <input type="checkbox"/> Business-to-business	1. Forecasting tools
8 <input type="checkbox"/> Business-to-consumer	1. Forecasting tools

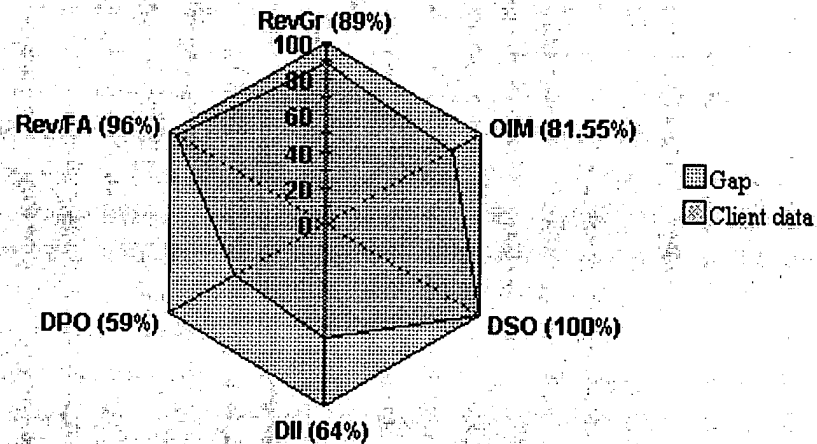
Thus, the claimed invention has quickly determined that the customer has an inventory problem and has reduced 20 possible root causes down to 3. The claimed invention has suggested a number of solution areas to address these root causes. The solution areas have been arranged in order of importance based on the number of root causes potentially addressed. For this example, an 'Advanced Planning' solution is considered the most desirable since it addresses all 3 root causes detected by the system. Implementing an 'Advanced Planning' solution would therefore help improve the customer's financial problems.

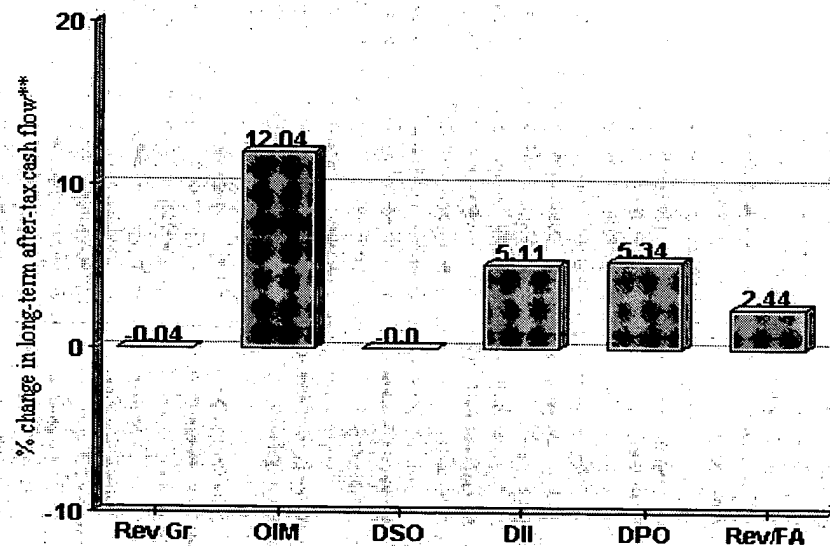
The claimed invention also provides a list of commercial solutions and services in each of the identified solution areas. We have not included an example of such a list in this document.

The claimed invention also provides a business case analysis for each customer. In the following example, numbers shown in boxes are entered by the customer.

Business assessment and solution valuation report for Your company**Finlistics(R) solutions industry gap analyzer****Malt beverages (SIC: 2082) - North America -- Your company**

Inventory carrying cost	10.0%
Marginal tax rate	40.0%
Fixed asset depreciation	6.7%
Cost of capital	10.4%
Cost of goods sold	57.5%

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Finlistics(R) solutions industry gap analyzer							
Your company vs. target -- Malt beverages (SIC: 2082) - North America							
Financial metric	Median	1st quartile	Your company current	Your company target	% change	1st year cash flow benefit per 10m in revenue*	% change in long-term after-tax cash flow**
Revenue growth	8.9 %	15.77 %	8.94	10.0	11.86 %	0.0	-0.04 %
Operating income margin	8.97 %	19.54 %	8.97	11.0	22.63 %	0.2	12.04 %
Days sales outstanding	26.0	20.0	26.0	26.0	0.0 %	-0.0	-0.0 %
Days in inventory	55.0	35.0	55.0	35.0	36.36 %	0.35	5.11 %
Days purchases outstanding	47.0	135.0	47.0	80.0	70.21 %	0.52	5.34 %
Revenue / fixed assets	2.12	2.98	2.12	2.2	3.77 %	0.18	2.44 %
Total long-term operating cash flow gap						1.25	24.89 %

* Before-tax cash flow (in millions).

** Based on present value of change in after-tax cash flow.

The claimed invention links the customer's personal and business profile gathered during the survey to a business case that highlights the high priority areas to focus on to improve cash flow. In the above example, the customer provides some additional quantitative details for his

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company, namely Inventory Carrying Cost, Marginal Tax Rate, Fixed Asset Depreciation, Cost of Capital and Cost of Good Sold. Next the system provides a business case analysis projecting changes in the cash flow if the company's current financial metrics (provided by the customer) are improved to target values (also provided by the customer). In this example, the customer has projected significant improvements to several financial metrics. In this example, these changes result in a projected \$1.25M first year cash flow increase for every \$10M in revenue for the business.

REJECTION UNDER 35 U.S.C. § 112, SECOND PARAGRAPH

The Examiner rejected independent Claims 43, 44, and 45, and dependent Claims 3-10, 12-17, 20-22, 25-34, and 37-42, under 35 U.S.C. § 112, second paragraph, on the basis that, with reference to Claims 43-45, each of the following is vague:

- “presenting a dynamic set of questions . . . said dynamic set of questions” (Claim 43, lines 11-16; *see also* Claim 44, lines 13-18; Claim 45, lines 13-18)
- “using a computer to analyze a user's answer . . . to said user” (Claim 43, lines 17-19; *see also* Claim 44, lines 19-22; Claim 45, lines 19-22)
- “using a computer to analyze a user's answer . . . on investment analysis” (Claim 43, lines 20-22; *see also* Claim 44, lines 23-25; Claim 45, lines 23-25)
- “selecting a specific industry code associated with the selected industry” (Claim 43, line 23; *see also* Claim 44, lines 26-27; Claim 45, lines 26-27)

(Office Action at 2-3) The example of the claimed invention is provided in the description of the claimed invention, above, in response to the Examiner's request.

With regard to “presenting a dynamic set of questions . . . said dynamic set of questions” (Claim 43, lines 11-16; *see also* Claim 44, lines 13-18; Claim 45, lines 13-18), the Examiner's comments asserting a lack of clarity as to the relationship of this step to

preceding steps and the language of the claim have been addressed by the amendments to the appropriate paragraphs of Claims 43, 44 and 45, as set forth above.

With regard to “using a computer to analyze a user’s answer . . . on investment analysis” (Claim 43, lines 20-22; *see also* Claim 44, lines 19-22; Claim 45, lines 19-22), the Examiner’s comments asserting a lack of clarity as to the relationship of this step to preceding steps and the language of the claim have been addressed by the amendments to the appropriate paragraphs of Claims 43, 44 and 45, as set forth above.

With regard to “using a computer to analyze a user’s answer . . . on investment analysis” (Claim 43, lines 20-22; *see also* Claim 44, lines 19-22; Claim 45, lines 19-22), the Examiner’s comments asserting a lack of clarity as to the relationship of this step to preceding steps and the language of the claim have been addressed by the amendments to the appropriate paragraphs of Claims 43, 44 and 45, as set forth above.

With regard to “selecting a specific industry code associated with the selected industry” (Claim 43, line 23; *see also* Claim 44, lines 26-27; Claim 45, lines 26-27), the Examiner’s comments asserting a lack of clarity as to the relationship of this step to preceding steps and the language of the claim have been addressed by the amendments to the appropriate paragraphs of Claims 43, 44 and 45, as set forth above. The Examiner’s comments regarding the absence of a discussion of using an “interactive communications medium” (Office Action at 3) has been addressed by the amendments, as set forth above, to Claim 43, lines 10-11, to Claim 44, lines 10-11, and to Claim 45, lines 8-9.

Thus, as currently amended, Claims 43, 44 and 45 particularly point out and distinctly claim the subject matter of the claimed invention as required by 35 U.S.C. § 112, second paragraph.

REJECTION UNDER 35 U.S.C. § 103(a)

The Examiner rejected independent Claims 43, 44, and 45, and dependent Claims 4-10, 12-17, 25-34, and 37-42, under 35 U.S.C. § 103(a) on the basis that the claims are suggested by U.S. Patent Application No. 2001/0032092 to Calver in view of U.S. Patent Application No. 2002/0042751 to Sarno. The Examiner also rejected

independent Claims 43, 44, and 45 and dependent Claims 5-10, 25-27, 32-33, 37-38, and 40 under 35 U.S.C. § 103(a) on the basis that the claims are suggested by Calver in view of Sarno and further in view of U.S. Patent No. 6,591,256 to Friedman.

In making these rejections, the Examiner repeated verbatim the grounds for rejection pursuant to 35 U.S.C. § 103(a) which had been given in the previous office action. Because the basis for rejection is unchanged, Applicants' previous response to those comments is incorporated herein by reference.

The claimed invention includes *inter alia* the following features which are not to be found in Calver:

- (1) Performs business case analysis based on answers to questions in our survey.
- (2) Provides benchmark values for some questions to help customers make their selections.
- (3) Makes allowance for a solution area, which is a generic description of a problem solution. (Such an intermediate level allows customers to look into solutions and services beyond what the tool provides in its list of recommended solutions and services. Since solutions and services are constantly changing and new ones are being introduced, it is not possible for any system to have a complete list available at all times. An intermediate description, which does not change as often, helps customers to understand more generally what they need.)
- (4) Provides business partner support by allowing solutions to be configured by business partners of a firm employing the claimed invention.
Recommendations coming from the claimed invention depend not only on the customer's profile and survey answers but also on the business partner solutions that have been configured.

Sarno is cited to teach many well known business analysis parameters like return on investment. Unlike Sarno, however, the claimed invention automatically links dynamic survey answers to financial analysis. The claim does not go to the financial

calculation itself but to the business method of linking dynamic survey answers to financial analysis to justify recommended solutions and services.

Friedman does not provide the features of the claimed invention for which it is relied upon by the Examiner. After allowing a customer to descend through some menus to select an appropriate mathematical program, Friedman then asks the customer to type inputs into a mathematical program. This is not feasible in the context of the claimed invention because of the large number of inputs that would be required. The claimed invention does not attempt to solve a problem within the survey but merely recommend a business solution.

There is no reason why it would be obvious to combine the web-based portal of Calver with Sarno's systems and methods for business-to-business financial transactions. Nor is it obvious to combine either Calver or Sarno with an interface for solving mathematical problems, as in Friedman. The Examiner does not suggest a reason as to why it would be obvious to combine these references, other than "to provide a complete analysis of the impact of an investment on a business." (Office Action at 13) However, because the references are directed to problems other than the problem addressed by the claimed invention, neither the nature of the problem to be solved, the teachings of the prior art, nor the knowledge of persons of ordinary skill in the art suggests a combination of these references. As a result, the combination relied on by the Examiner is not obvious. See M.P.E.P. § 2143.01 (citing *In re Rouffet*, 149 F.3d 1350, 1357, 47 U.S.P.Q.2d 1453, 1457-58 (Fed. Cir. 1998); *Al-Site Corp. v. VSI Int'l Inc.*, 174 F.3d 1308, 50 U.S.P.Q.2d 1161 (Fed. Cir. 1999)).

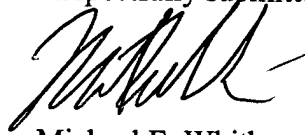
Finally, because the claimed invention includes features which are not found in Calver, Sarno or Friedman, even if a combination of these references were obvious, there would be no basis for rejecting the claimed invention as obvious in light of the hypothetical combination.

CONCLUSION

In view of the foregoing, Applicant submits that Claims 4-17, 20-22, 25-34, and 37-45 are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue. The Examiner is invited to contact the undersigned at the telephone number listed below, if needed.

Applicant hereby makes a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to Applicants' Deposit Account No. 50-0510 (IBM Corporation).

Respectfully submitted,



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